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CHAMBERS OF  
DEBORAH A. BATTIS  
U.S.D.J.

August 26, 2010

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**By Hand Delivery**

Hon. Deborah A. Batts  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Great American Insurance Company v. American International  
Group, Inc., et al.  
No. 09 CIV 4476 (S.D.N.Y.)

Dear Judge Batts:

This firm represents Interpleader Defendants and Cross-Claim Defendants Starr International Company, Inc., C.V. Starr & Co., Inc., Maurice R. Greenberg, Edward E. Matthews, and Howard I. Smith in the above-referenced interpleader action.

With reference to the Stipulation entered by Your Honor on September 23, 2009, which stayed this action pending the conclusion of binding arbitration of various legal disputes among Interpleader-Plaintiff Great American Insurance Company (“Great American”), Interpleader Defendant and Cross-Claimant American International Group, Inc. (“AIG”) and Messrs. Greenberg and Smith, and Your Honor’s Memo Endorsement of April 28, 2010 continuing the stay of this action for 120 days, this constitutes a joint report to the Court by the above-referenced parties to this action regarding the status of this action.

Only yesterday, AIG, Greenberg, Matthews and Smith, along with many other parties plaintiff and defendant outside this proceeding, executed a settlement agreement resolving various state and federal derivative cases that directly relate to the insurance policies that are the subject of the instant action. In the next two months, plaintiffs in those cases will apply to their respective courts for approval of that settlement. The parties to the derivative case settlement simultaneously are negotiating a related settlement agreement and release with Great American and a number of other D&O insurance carriers whose policies are intended to fund the derivative settlement. The latter settlement agreement will contain provisions requiring the voluntary dismissal of the instant action.

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MEMO ENDORSED

On behalf of all of the above-referenced parties to this action, I respectfully request that the existing stay be continued for 120 days, at the end of which period the parties shall jointly report to the Court regarding the status of this action and the desirability of lifting the stay, dismissing the action or taking other appropriate steps, in the event the action has not already been dismissed.

Granted  
DAB/  
8-27-10

Thank you for Your Honor's kind attention to this matter. Should the Court have any questions, I can be reached at (212) 446-2380.

MEMO ENDORSED

Respectfully yours,

Steven I. Froot / ryc

Steven I. Froot

cc: James Sandnes, Esq. (*via e-mail*)  
Edward P. Krugman, Esq. (*via e-mail*)  
Vincent A. Sama, Esq. (*via e-mail*)

SO ORDERED

Deborah A. Batts  
DEBORAH A. BATTES  
UNITED STATES DISTRICT JUDGE